R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com

November 7, 2002

Ex parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-B204
Washington, D.C. 20554

Re: **WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing in response to recent inquiries by Commission staff. The attached information provides updates on Qwest's commercial volumes and commercial performance for unbundled loops and line sharing.

Please contact Carol Simpson at Hogan & Hartson if you have any questions. Thank you.

Respectfully submitted,

Hance Haney

Unbundled Loops and Line Sharing – Commercial Volumes Update

Unbundled Loops. The following chart provides an update of the number of stand-alone unbundled loops Qwest had in service for CLECs in the nine states included in this application as of September 30, 2002. [1/]

State	Analog Loops in Service	xDSL-Capable Loops in Service	High-Capacity Loops in Service [2/]	Total Loops in Service	# of CLECs
Colorado	53,138	9,322	1,086 (1.7% of total loops in service)	63,546	15
Idaho	5,271	576	35 (.6% of total)	5,882	5
Iowa	42,998	1,916	32 (.07% of total)	44,946	10
Montana	1,725	1,351	217 (6.6% of total)	3,293	6
Nebraska	16,465	2,180	17 (.09% of total)	18,662	5
North Dakota	12,704	3,951	87 (.5% of total)	16,742	8
Utah	27,352	3,677	261 (.8% of total)	31,290	11
Washington	47,186	10,941	3,063 (5.0% of total)	61,190	16
Wyoming	5	475	6 (1.2% of total)	486	2

[1/] These figures update the commercial volume figures cited in the Qwest I and Qwest II applications. *See* Qwest I Unbundled Loop Declaration of William M. Campbell at ¶ 72; Qwest II Unbundled Loop Declaration of William M. Campbell at ¶ 73.

[2/] Qwest has one DS3 loop in service in Idaho. Apart from that, all of the high-capacity loops Qwest has in service for CLECs in the states included in this application are DS1 loops. As noted in the Qwest I and II applications, high-capacity loops represent a very small percentage of the total loops Qwest has in service in each state.

Line Sharing. As of September 30, 2002, Qwest had in service a total of 14,409 shared loops for 14 CLECs in the nine states included in this application. The following chart provides specific figures for each state. [3]/

State	Shared Loops in Service	Number of CLECs
Colorado	5,855	6
Idaho	4	1
Iowa	312	3
Montana	309	2
Nebraska	126	2
North Dakota	0	0
Utah	1,858	2
Washington	5,850	4
Wyoming	95	1

Unbundled Loops and Line Sharing – June-September Commercial Performance Update

Qwest filed performance data through September 2002 for the states included in this application with the Commission on October 28, 2002, and statewide average summaries for the same states on October 31, 2002. These reports show that Qwest's performance for unbundled loops and line sharing has remained consistent over the months since Qwest filed its first application with the Commission. An additional four months of performance results for unbundled loops and line sharing have revealed no significant performance problems beyond those that were identified and explained in Qwest's original applications. The Commission has asked Qwest to provide updates on some specific aspects of its unbundled loop and line sharing performance, which are addressed below.

Line Sharing Performance with Out of Service Status Implementation and Future Repair Tickets

A review of MR-4 and MR-6 line sharing regional data for the period of June-September 2002 displays a strong positive trend for line sharing repairs requiring the dispatch of a technician. While repair data in June and July failed to meet parity, both August and September met the parity standard. It is noteworthy that August and September results were the first two months after agreement in the Change Management Process (effective July 29, 2002)

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[3]/ These figures update the commercial volume figures cited in the Qwest I and Qwest II applications. *See* Qwest I Line Sharing Declaration of Karen A. Stewart at ¶ 42; Qwest II Line Sharing Declaration of Karen A. Stewart at ¶ 43.

to treat trouble reports related to line shared loops as "Out of Service" rather than "Service Affecting." This is an important distinction because the change in process moves line sharing repairs to a higher priority in the repair queue. Prior to July 29, line shared loops received a "Service Affecting" status and a 48-hour restoration objective, whereas after that time, the process was changed to assign an "Out of Service" status. Now such repairs are treated as "Out of Service" troubles to be resolved within 24 hours or less of receipt of the trouble report. The higher priority placed on line shared loop trouble reports in August and September has positively affected the results for these measures.

Qwest also tracks line sharing performance for repairs that do not require a technician dispatch. Analysis of regional data for the mean time to restore (MR-6) for line sharing from June-September 2002 within this category show that the metric trended positively during June through August, but fell sharply in September. As Qwest explained in its reply comments in the Qwest I proceeding:

> [O]ne prominent DLEC requests "future" repairs approximately 10% of the time. In other words, this DLEC will contact Qwest and ask Qwest to repair a problem at some designated time in the future, but does not accept the next available repair appointment time.
>
> Currently, all of this waiting time is included in the mean time to restore (MR-6) and restoration intervals (MR-3 and MR-4), thereby creating the incorrect appearance that all of this repair time was attributable to Qwest. [4/]

In September, the percentage of delayed repairs was substantially higher than 10%. Analysis of the September data revealed that 33 of 119, or 27.7%, of the trouble reports were requests for CLEC requested future appointments. This is where, for example, a CLEC requests a joint meet of technicians at the Central Office to verify wiring. The 33 trouble tickets referenced had an average resolution time of 33 hours and 15 minutes, due to extended periods of "hold" time that Qwest could not perform work based upon the CLEC's request. For each of these 33 tickets, the requested hold time exceeded the 24-hour restoration objective. Removing the time attributable to the future appointments, Qwest mean time to repair would have resulted in an

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[4/] Qwest I Reply Declaration of Karen A. Stewart at ¶¶ 47-48.

average of 1 hour and 40 minutes for the 33 trouble tickets – a 31.5-hour reduction. Removing this time not attributable to Qwest, the regional mean time to restore in September would have been 8 hours, 4 minutes.

MR-4 line sharing regional data for the same period for non-dispatch trouble reports was at parity for June and August, and out of parity for July and September. Analysis of the September data showed that 33 of 119, or 27.7%, of the trouble reports received were requests for future appointments. Of the 33 tickets containing requests for future repair appointments, 9 trouble tickets had a requested hold time by the CLEC of greater than 48 hours. Thus, for these tickets it was impossible for Qwest to meet the 48-hour restoration objective within MR-4. Removing the additional time attributed to the future appointments, Qwest mean time to restore would have resulted in an average of 3 hours and 45 minutes for the 9 tickets. The regional September result for MR-4 is 91.6%

The issue of future appointments was addressed in an ex parte filed by Qwest on August 20, 2002 (8/20/02g). In order to address the CLEC-caused repair time included in the repair intervals, Qwest began applying the "No Access" status to trouble tickets with future appointments on October 22, 2002, which will be reflected in November official results for MR-3, MR-4, and MR-6.

Explanation of OP-5 Misses in Washington for ISDN-Capable Loops

Qwest's New Installation Service Quality (OP-5) commercial performance results in Washington indicate that Qwest has provided ISDN-capable loops at parity 3 of the past 6 months. In its Qwest I filing, Qwest identified an RCMAC issue that was corrected and provided positive results for May. However, for June and July, results once again were below parity. Low provisioning volumes for June and July adversely affected OP-5 commercial performance for ISDN-capable loop parity scores, as evidenced by the standard deviation (32.29% in June and 26.51% in July). Additionally, in reviewing the trouble tickets included in OP-5 reporting, Qwest's network was not the cause of trouble for 3 of the 11 tickets in June and 2 of the 7 in July. By removing the tickets coded to NTF/TOK (i.e., OP-5*) that were not caused by Qwest, commercial performance for OP-5 in June improves from 88.17% to 91.40%, and July improves from 92.39% to 94.57%.

Nonetheless, Qwest instituted daily calls focused on ISDN-capable loop provisioning as part of its ongoing continuous performance improvement efforts. These calls have resulted in an effort to reinforce ISDN-capable loop

testing processes that ensure circuit quality before turnover to the CLEC customer. For example, these efforts include reinforcement of the instructions for the correct provisioning tests to conduct, the physical points where these tests should be performed, and recording of the test results.

These changes have contributed to bringing OP-5 commercial performance for ISDN-capable loops into parity for August and September in Washington.

Hot Cut Update

Qwest converts existing customers to CLEC service via "lift and lay" procedures, also referred to as "hot cuts." Qwest tracks the time interval associated with the "lift and lay" activities (i.e., moving a customer's line from a Qwest switch to a CLEC switch) within the performance measure OP-7. OP-7 measures the time involved in disconnecting the loop from the Qwest network and connecting and testing the loop to the CLEC network.

Because the majority of hot cuts are performed on analog loops, this discussion focuses on that product set. Between June and September, Qwest ranged between 1:42 and 3:26 (minutes:seconds), with an average of 2:46 to perform the lift and lay procedure for analog loop hot cuts in Montana, Utah, and Washington. There were no analog loop hot cuts in Wyoming during this period. Between May and September, Qwest results ranged between 2:50 and 3:23, with an average of 3:14, to perform analog loop hot cuts in Colorado; between 1:40 and 3:06, with an average of 2:34, in Idaho and Iowa; and between 2:04 and 3:58, with an average of 2:85, in Nebraska and North Dakota.

The following tables are provided to show the actual times, by state and by month, that it took Qwest to perform the lift and lay procedure for analog loops. As noted above, Qwest performed no analog loop hot cuts in Wyoming during this period.

Colorado - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
May-02	69:46	1356	3:05
Jun-02	47:04	996	2:50
Jul-02	56:43	1038	3:17
Aug-02	63:59	1132	3:23
Sep-02	49:30	947	3:08

Idaho - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
May-02	4:45	92	3:06
Jun-02	2:37	66	2:23
Jul-02	4:12	110	2:17
Aug-02	4:11	95	2:39
Sep-02	1:46	62	1:43

Iowa - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
May-02	13:15	285	2:47
Jun-02	19:18	471	2:28
Jul-02	27:41	757	2:12
Aug-02	30:40	848	2:10
Sep-02	19:11	690	1:40

Nebraska - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
May-02	2:56	76	2:19
Jun-02	6:57	166	2:31
Jul-02	4:06	119	2:04
Aug-02	6:17	95	3:58
Sep-02	7:22	130	3:24

North Dakota - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
May-02	5:45	137	2:31
Jun-02	6:13	98	3:48
Jul-02	4:18	88	2:56
Aug-02	2:52	81	2:07
Sep-02	3:28	74	2:49

Montana - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
Jun-02	0:48	14	3:26
Jul-02			
Aug-02	0:51	18	2:50
Sep-02	0:17	10	1:42

Utah - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
Jun-02	43:56	935	2:49
Jul-02	31:05	765	2:26
Aug-02	38:16	912	2:31
Sep-02	42:25	854	2:59

Washington - OP-7 Coordinated "Hot Cut" Interval			
Month	CLEC Numerator (Hrs:Min)	CLEC Denominator	CLEC Result (Min:Secs)
Jun-02	60:23	1265	2:52
Jul-02	47:48	1104	2:36
Aug-02	74:55	1317	3:25
Sep-02	47:48	989	2:54